

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN DOE,	)	CASE NO. 22-11540
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MASSACHUSETTS INSTITUTE OF	)	
TECHNOLOGY,	)	
	)	
Defendants.	)	

**PLAINTIFF’S MOTION TO PROCEED UNDER A PSEUDONYM AND FOR  
PROTECTIVE ORDER**

Plaintiff John Doe, by and through the undersigned attorneys, hereby moves this Court to allow Plaintiff in the above-captioned action to proceed under the pseudonym “John Doe” and for a protective order. The reasons for this motion are set forth in the attached Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion to Proceed Under Pseudonym and for Protective Order. Plaintiff further submits the affidavit of John Doe in support of this motion. John Doe respectfully requests that he be permitted to seek redress anonymously and that any documents that must be filed with his real name be permitted to be filed under seal. John is also seeking to maintain the anonymity of non-party classmates through the use of pseudonyms.

**LOCAL RULE 7.1 CERTIFICATION**

Plaintiff, through his counsel, conferred with the general counsel’s office for Defendant MIT by telephone on September 14, 2022, regarding the relief requested in this motion. Following the parties’ conference, Defendant has neither objected nor consented to the relief requested in this motion, stating that Defendant was without sufficient time to formulate a response.

**CERTIFICATE OF SERVICE**

I, Ruth O'Meara-Costello, hereby certify that on this 19th day of September, 2022, a true and correct copy of the foregoing was filed through the ECF System, which will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served upon anyone indicated as a non-registered participant.

Dated: September 19, 2022

Respectfully submitted,

/s/ Ruth O'Meara-Costello

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*\*Motion to Admit Pro Hac Vice pending*

*Counsel for Plaintiff John Doe*